| 1 2 3 4 5 6 7 8 9 | GAIL SHIFMAN Law Office of Gail Shifman 2431 Fillmore Street San Francisco, CA 94115-1814 Tel: 415-551-1500 Email: gail@shifmangroup.com JAMES S. THOMSON Attorney and Counselor at Law 732 Addison Street, Suite A Berkeley, CA 94710 Tel: 510-525-9123 Email: james@ycbtal.net Attorneys for Defendant JOSE NOE RAMIREZ-AVELAR | |
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| 12 | UNITED STATES DISTRICT COURT | |
| 13 | NORTHERN DISTRICT OF CALIFORNIA | |
| 14 | SAN JOSE DIVISION | |
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| 16 | UNITED STATES OF AMERICA, | CASE NO. CR 17-0068-EJD |
| 17 | Plaintiff, | STIPULATION AND [PROPOSED] ORDER |
| 18 | v. | ONDER |
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| 20 | ERICK ESCALANTE-TORRES, and JOSE NOE RAMIREZ-AVELAR, | |
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| 22 | Defendants. | |
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| 24 | The parties last appeared before the Court on August 28, 2023, and are next scheduled to appear | |
| 25 | before the Court on December 4, 2023. The parties are jointly seeking to continue the next court | |
| | appearance to February 5, 2024. The Court previously set trial to commence on April 2, 2024, and | |
| 26 | excluded Speedy Trial time through that scheduled trial date. | |
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| | STIP AND [PROPOSED] ORDER CASE NO. 17-CR-00068 EJD | |

| 1 | SO STIPULATED. | |
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| 2 | DATED: November 28, 2023 | |
| 3 | | ISMAIL J. RAMSEY |
| 4 | | United States Attorney |
| 5 | | <u>/s/Stephen Meyer</u> STEPHEN MEYER |
| 6 | | ASEEM PADUKONE |
| 7 | | Assistant United States Attorneys |
| 8 | /s/Richard Tamor | /s/Gail Shifman |
| 9 | RICHARD TAMOR | GAIL SHIFMAN and JAMES S. THOMSON |
| 10 | Counsel for Defendant Erick Escalante-Torres | Counsel for Defendant Jose Noe Ramirez-Avelar |
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| 12 | [PROPOSED] ORDER GRANTING STIPULATION | |
| 13 | The Court hereby continues the status conference from December 4, 2023, to February 5, 2024. | |
| 14 | The Court previously excluded time under the Speedy Trial Act through the trial date of April 2, 2024. | |
| 15 | IT IS SO ORDERED. | |
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| 17 | Dated: November 28, 2023 | HONORABLE EDWARD J. DAVILA |
| 18 | | UNITED STATES DISTRICT JUDGE |
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